

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

XIN YUE,	:	
	:	CIVIL NO. 2:20-CV-05099-JMV-MF
Plaintiff,	:	
V.	:	CONSENT MOTION FOR
	:	EXTENSION OF TIME TO
STEWART LOR,	:	ANSWER, MOVE, OR OTHERWISE
	:	RESPOND TO THE PLAINTIFF'S
Defendant.	:	COMPLAINT
	:	

Pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure and Local Civil Rule 6.1, the Defendant Stewart Lor (“Lor”) respectfully moves for the entry of an order extending by thirty (30) days the time within which Lor may answer, move, or otherwise respond to the Plaintiff’s Complaint. In support of this motion, Lor states as follows:

1. Lor was served with the Complaint on May 6, 2020.
2. In accordance with Standing Order 2020-09, the deadline for responding to the Complaint was extended to June 29, 2020.
3. Lor respectfully requests that the Court issue an order further extending the deadline to respond to the Complaint by thirty (30) days to July 29, 2020.
4. This extension is being sought in good faith for a proper purpose and is not intended to unduly or unnecessarily delay these proceedings. Lor has been diligently working to gather information necessary to respond completely to the Complaint. However, limitations on Lor and his counsel as a result of, among other things, the COVID-19/Coronavirus pandemic, have caused delays in accessing certain information.

5. Prior to filing this motion, undersigned counsel for Lor conferred with counsel for the Plaintiff and the Plaintiff consents to the extension of Lor's deadline to answer, move, or otherwise respond to the Complaint until July 29, 2020.

6. A proposed consent order is attached hereto as Exhibit A.

WHEREFORE, the Defendant Stewart Lor respectfully moves for the entry of an order extending the deadline by which it must answer, move, or otherwise respond to the Complaint until July 29, 2020.

Dated: June 24, 2020

Respectfully submitted,

DEFENDANT
STEWART LOR

/s/ Michael H. Bernstein

Michael H. Bernstein
(NJ Bar ID No.: 253282017)
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/s/ Elizabeth R. Leong

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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

XIN YUE,

Plaintiff,

V.

STEWART LOR,

Defendant.

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CERTIFICATE OF SERVICE

I, Michael H. Bernstein, hereby certify and affirm that a true and correct copy of the attached CONSENT MOTION FOR EXTENSION OF TIME TO ANSWER, MOVE, OR OTHERWISE RESPOND TO THE PLAINTIFF'S COMPLAINT was served via ECF on this 24th day of June, 2020, upon the following:

JACOB CHEN, ESQ.
DAI & ASSOCIATES, P.C.
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NEW YORK, NY 10036
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HOWARD GUTMAN
LAW OFFICE OF HOWARD GUTMAN
230 ROUTE 206, SUITE 307
FLANDERS, NJ 07836

/s/ Michael H. Bernstein
Michael H. Bernstein (NJ Bar ID No.: 253282017)

Dated: New York, NY
June 24, 2020

EXHIBIT A

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

XIN YUE,

Plaintiff,

V.

STEWART LOR,

Defendant.

:
: CIVIL NO. 2:20-CV-05099-JMV-MF
:
:
: **[PROPOSED]**
: **CONSENT ORDER**
:
:
:

THIS MATTER having been brought before the Court by Robinson & Cole LLP, attorneys for the Defendant Stewart Lor, for an order allowing an extension of time of thirty (30) days within which to answer, move, or otherwise respond to the Plaintiff's Complaint, on notice to and with consent of attorneys for the Plaintiff;

IT IS, this _____, day of _____, 2020, hereby

ORDERED that the Defendant's response to the Plaintiff's Complaint is to be filed on or before July 29, 2020.

SO ORDERED:

John Michael Vazquez, U.S.D.J.